

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LAURIE-JO STRATY, TEXAS ALLIANCE
FOR RETIRED AMERICANS and BIGTENT
CREATIVE,

Plaintiffs,

vs.

GREGORY ABBOTT, in his official capacity
as Governor of the State of Texas; and RUTH
HUGHS, in her official capacity as Texas
Secretary of State,

Defendants.

Civil Action No. 1:20-cv-1015

Related to:

*Texas League of United Latin American
Citizens v. Abbott*, No. 1:20-cv-1006

**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs Laurie-Jo Straty, Texas Alliance for Retired Americans, and Bigtent Creative, for the reasons set forth in the memorandum of law filed concurrently with this Motion, as supported by the exhibits and declarations submitted therewith, respectfully move for an order:

- (1) temporarily restraining Defendants, and their respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them, from taking any action to inhibit election administrators from offering more than one drop-off location for ballots in their respective counties;
- (2) preliminarily enjoining Defendants and their respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them, from taking any action to inhibit election administrators from offering more than one drop-off location for ballots in their respective counties; and
- (3) granting such other or further relief as the Court deems just and proper.

Plaintiffs have not conferred with Defendants because Defendants' counsel have not appeared in this case. Plaintiffs filed their complaint on Friday, October 2, and the Court has not yet issued the summonses.

Dated: October 5, 2020

Respectfully submitted,

/s/ Skyler Howton

Skyler M. Howton, TX# 24077907
PERKINS COIE LLP
500 North Akard St., Suite 3300
Dallas, TX 75201-3347
Telephone: (214) 965-7700
Facsimile: (214) 965-7799
showton@perkinscoie.com

Marc E. Elias*
John M. Devaney**
John M. Geise*
Stephanie Command*
PERKINS COIE LLP
700 Thirteenth Street, N.W., Suite 800
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-6211
melias@perkinscoie.com
jdevaney@perkinscoie.com
jgeise@perkinscoie.com
scommand@perkinscoie.com

Danielle Sivalingam (Serbin)**
Gillian Kuhlmann*
PERKINS COIE LLP
1888 Century Park East, Suite 1700
Century City, California 90067
Telephone: (310) 788-9900
Facsimile: (310) 788-3399
dsivalingam@perkinscoie.com
gkuhlmann@perkinscoie.com

Jessica Frenkel**
PERKINS COIE LLP
1900 Sixteenth Street
Suite 1400
Denver, Colorado 80202-5255

Telephone: (303) 291-2300
Facsimile: (303) 291-2400
jfrenkel@perkinscoie.com

Attorneys for Plaintiffs

**Pro hac vice applications pending*
***Pro hac vice applications forthcoming*